LOUISVILLE - JEFFERSON COUNTY METRO GOVERNMENT
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204
8 February 2004

TITLE V PERMIT SUMMARY

Company: Oxy Vinyls, LP

Plant Location: 4014 Bells Lane, Louisville, KY 40211

Date App. Received: 21 February 1997; 28 April 1999

Date Admin. Complete: 18 April 1997; 30 June 1999

District Engineer: Stephen Taylor **Permit No.:** 212-99-TV (R1)

Plant ID: 1333 **SIC Code:** 2821 **NAICS:** 325211 **AFS:** 01333

Introduction:

This permit will be issued pursuant to: (1) Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO_2), nitrogen oxides (NO_X), carbon monoxide (CO), particulate matter (PM), and particulate matter less than 10 microns (PM_{10}); unclassifiable for particulate matter less than 2.5 microns ($PM_{2.5}$); and is a moderate non-attainment area for ozone (O_3).

Application Type/Permit Activity:

[ ] Initial Issuance
[ ] Permit Revision
    [ ] Administrative
    [ ] Minor
    [X] Significant
[ ] Permit Renewal

Compliance Summary:

[X] Compliance certification signed [ ] Compliance schedule included
[ ] Source is out of compliance

I. Source Description

1. Class I Area Impacts: This source is not located in or near a Class I area**.**

2. Product Description: The source manufactures polyvinyl chloride (PVC) resins and operates a steam plant.

3. Overall Process Description: Vinyl chloride monomer (VCM) is transferred from railcars to pressure vessels for storage. From these storage spheres the VCM is transferred to either OxyVinyls' PVC suspension resin process or Noveon's (formerly BFGoodrich and PMD Group) PVC latex process. In OxyVinyls' Large Poly Area (LPA) vinyl chloride monomer is polymerized in reactors, and the residual monomer is steam stripped from the polyvinyl chloride resin slurry. The PVC slurry is centrifuged, dried into resin, and pneumatically conveyed to storage silos. From the storage silos the resin is loaded into railcars, trucks, or pneumatically conveyed to PolyOne (formerly The Geon Company) for use in its compounding process.

In addition, OxyVinyls operates a steam generating facility where fuel is burned in either of four boilers (two coal-fired and two natural gas/oil-fired). The generated steam is used by itself, PolyOne, Noveon, and Zeon Chemicals L.P. (Zeon).

4. Site Determination: There are no other facilities which are contiguous or adjacent and under common control. The District made this determination based on the following:

Single Source Determination for Noveon, PolyOne, OxyVinyls, and Zeon

Based on the information obtained from the companies listed above and the criteria that EPA uses for single source determination for NSR/PSD, the District has determined that the above named companies are four separate sources. The following information was used to make this determination.

The criteria that EPA uses for single source determination for NSR/PSD is as follows (you must meet all three criteria):

- Same Industrial Grouping (same first two digit SIC code) and,
- Common ownership or control and,
- Contiguous or Adjacent

From information submitted by the four companies; Zeon, Noveon, and OxyVinyls have the same first two digit SIC code (28). PolyOne’s SIC code is 3087. All four companies do not meet this first criteria.

The common ownership or control; Zeon, Noveon and PolyOne are 100% owned and operated by their parent companies. There is no common ownership or control between these three companies. OxyVinyls is owned 76% by Occidental Chemicals and 24% by PolyOne, but no controlling ownership for PolyOne, but, the administration board of OxyVinyls (the decision makers-- common control) is set up

as a joint venture meaning a 50-50 control between PolyOne and Occidental Chemicals. OxyVinyls and PolyOne is the only two that meet the second criteria.

All four companies meet the contiguous or adjacent criteria.

As EPA pointed out at least two or more of the companies have to meet all three criteria to be considered a single source for NSR/PSD applicability, and this would effect Title V applicability. As we have stated none of the above mentioned companies meet all three criteria in conjunction with any of the others, therefore, they are all single sources for NSR/PSD applicability.

5. Emission Unit Summary:

a. U-BLR Boilers: Four boilers (two coal-fired and two natural gas/oil-fired) are used to provide steam for itself; PolyOne; Noveon; and Zeon.

b. U-LPA Large Poly Area: Vinyl chloride monomer (VCM) is transferred from railcars as a liquefied compressed gas into spherical pressure vessels for storage. The VCM is then transferred from these storage spheres to either the OxyVinyls' PVC suspension resin process (known as the Large Poly Area, or LPA) or Noveon's PVC latex process. In the LPA, VCM is pumped into the reactors where it is mixed with water and additives to form a polyvinyl chloride (PVC) resin slurry. The resin slurry is transferred from the reactors into blowdown tanks and then to stripper column feed tanks. The resin slurry is steam stripped in continuous strippers to remove residual vinyl chloride monomer, and stored in blend tanks before being centrifuged and dried. The dried resin is screened and pneumatically-conveyed to silos for storage and loading into railcars or trucks. Some resin from the silos is pneumatically-conveyed to PolyOne's compounding process.

c. U-MSC Miscellaneous: The miscellaneous emission unit consists of various non-halogenated cold solvent parts cleaners.

6. Fugitive Sources: The source reports quarterly on fugitive VCM emissions in accordance with 40 CFR Part 63 Subpart J. Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, *Control of Fugitive Particulate Emissions*.

7. Permit Revisions:

Revision No.	Date of Reissuance	Public Notice Date	Proposed Date(s)	Emission Unit/Page No.	Description
Initial	12/30/2001	11/05/2000	12/18/2000; 05/02/2001; 08/18/2001	Entire Permit	Entire Permit

Revision No.	Date of Reissuance	Public Notice Date	Proposed Date(s)	Emission Unit/Page No.	Description
Rev 1		02/08/2004		U-LPA and U-MSC	MACT requirements added to the permit and updated cover page and general conditions, added construction permit 329-02, changed Regulation 7.18 to 6.18

a. Revision 1 was a significant permit revision to add 40 CFR 63 Subpart J and 40 CFR 63 Subpart UU requirements; update the cover page with new government logo and title; add general condition 37. *Stratospheric Ozone Protection Requirements*; remove 40 CFR 60 Subpart Kb since it is no longer applicable; add construction permit 329-02-C for installation of a wastewater tank (U-LPA-TK-2M); and change Regulation 7.18 to 6.18 for Emission Unit U-MSC.

8. Title V Major Source Status by Pollutant:

Pollutant	Actual Emissions 2001 Data (tpy)	Major Source Status (based on PTE)
CO	164.25	Yes
NO_X	483.14	Yes
SO_2	790.77	Yes
PM/PM_{10}	68.77/51.76	Yes
VOC	7.59	Yes
Single HAP > 1 tpy		
Vinyl Chloride	1.21	Yes
Methanol	2.15	Yes
2,2,4-Trimethylpentane	1.96	No
Hydrogen Chloride	36.19	Yes

Pollutant	Actual Emissions 2001 Data (tpy)	Major Source Status (based on PTE)
Hydrogen Fluoride	4.53	Yes
Total HAPs	46.04	Yes

9. MACT Standards: This source is major for HAPs. The source is subject to the following MACT:

40 CFR 63 Subpart A	General Provisions
40 CFR 63 Subpart J	National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production
40 CFR 63 Subpart UU	National Emission Standards for Equipment Leaks—Control Level 2 Standards

The source will be subject in the future to the following MACT:

40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial/Commerical/Institutional Boilers and Process Heaters

10. Applicable Requirements:

[X] PSD	[X] NSPS	[X] SIP	[ ] Other
[X] NSR	[X] NESHAPS	[X] District-Origin	[X] MACT

11. Referenced Federal Regulations in Permit:

40 CFR Part 61 Subpart A	General Provisions
40 CFR Part 61 Subpart F	National Emission Standard for Vinyl Chloride
40 CFR 63 Subpart A	General Provisions
40 CFR 63 Subpart J	National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production
40 CFR 63 Subpart UU	National Emission Standards for Equipment Leaks—Control Level 2 Standards
40 CFR Part 68 Subparts A, B & D thru H	Chemical Accident Prevention Provisions

II. Regulatory Analysis

1. Emission and Operating Caps: The source is not subject to any plant-wide emission or operating caps; however, PSD limits on PM and SO_2 have been accepted for Boiler #4 (U-BLR). In addition, annual and daily point-specific limits on PM have been

accepted for some Large Poly Area Emission Unit (U-LPA) emission points based on the following:

a. From the January 17, 1980 permit application with public comment (also submitted to EPA Region IV, who made the determination that PSD was not triggered), the emission limits in additional condition 1.c.i. were taken, after banked emissions were withdrawn for the increase in PM emissions from the LPA expansion. Ninety-five tons of PM emission per year were banked from the shutdown of dispersion PVC drying operations in building 129 and suspension PVC drying operations involving dryers No. 1, 2, and 3 in building 112.

b. From the August 13, 1992 permit application (rotary dryer-1H modification, previous permit #510-74 with a 20.2 tons per year PM limit) the TSP particulate matter emission increase is calculated to be less than 15 tons per year, therefore, the PM_{10} particulate matter emission increase is also assumed to be less than 15 tons per year, therefore, Regulation 2.05 *Prevention of Significant Deterioration of Air Quality* does not apply for PM_{10}. Since the permit application calculated PM emission of 35 tons per year, and this increase was approximately 14.8 tons per year (less than the significant level of 25 tons per year for PM), the District determined that PSD was not triggered and permitted the source for 35 tons PM per year. This modification was also 18 years after the original permit and did not trigger the contemporaneous period of 10 years for modifications.

c. From the September 13, 1993 permit application (silos TK-3K and TK-6K, added one ring to top of silos increasing their capacity and installed larger baghouses, previous permit #191-80 and 193-80 with a 5.94 tons per year PM limit per silo) the TSP emission increase is calculated to be less than 1.6 tons per year per silo, therefore, the PM_{10} particulate matter emission increase is also assumed to be less than 1.6 tons per year, therefore, Regulation 2.05 *Prevention of Significant Deterioration of Air Quality* does not apply for PM_{10}. Since the permit application calculated PM emission of 7.5 tons per year per silo, and this increase was approximately 1.56 tons per year (less than the significant level of 25 tons per year for PM), the District determined that PSD was not triggered and permitted the source for 7.5 tons PM per year per silo. This modification was also 13 years after the original permit and did not trigger the contemporaneous period of 10 years for modifications.

2. **Compliance Status:** The source signed and submitted a Title V compliance certification in both of its two (2) initial permit applications (before a separate company and as a separate company). Note, the source is in compliance with Regulation 2.16, section 3.1.1.1.4, which requires this source to submit a complete permit application by April 22, 1997. The Geon Company (now PolyOne) submitted its initial permit application on February 21, 1997, which was determined administratively complete on April 18, 1997. At that time, OxyVinyls was part of The Geon Company and not a separate company. However, because OxyVinyls was created as a separate company on May 1, 1999, OxyVinyls submitted an initial permit

application on April 28, 1999. This second initial application was determined to be administratively complete on June 30, 1999.

3. Operational Flexibility: The source did request three alternative operating scenarios in its Title V permit application. The District has determined two of these, for raw materials use and equipment use, do not fit the definition of an Alternative Operating Scenario, an option by which a source has defined a *specific*, alternative mode of operation.

The third, approved by the District, addresses alternate control for VCM in U-LPA. Instead of the Vent Gas Absorber System (VGA), final VCM emission control may also be provided by the Flameless Thermal Oxidizer (FTO), C-LTX-TK-FTO-1, of Noveon. When Noveon and/or OxyVinyls is using the VGA system for final control, the owner or operator shall monitor the VGA system to demonstrate compliance with the applicable emission limits as required by the Vinyl Chloride NESHAP and certify compliance as required by Regulation 2.16.

4. Testing Requirements: The source is required to perform NO_X performance testing on Boilers #4 & #6. The source is required to perform an initial PM stack test, to verify control device efficiencies and/or emission factors, on emission points E-BLR-ASH; E-BLR-#4CCS; E-LPA-(4D; 6D; 13D; 30D; 25D; 2N; 1C; 4C; & 8C); E-LPA-RR#1BIN; and E-LPA-[DR-1M (including HPR-2M); SED-1M; SED-1H (including DR-1H; SED-3H; HPR-1H); TK- (1K thru 10K); and VCS].

5. Monitoring, Record Keeping and Reporting Requirements: The source is required to monitor and maintain records of various operating parameters to demonstrate compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

Periodic Monitoring:

a. U-BLR Boilers:

i. **PM** - In place of parametric monitoring of control devices required to meet PM standards, the source has chosen to perform preventive maintenance to monitor proper operation of required control devices. For emission points [E-BLR-(ASH & #4CCS)] subject to Regulation 6.09 or 7.08, the source has submitted one-time compliance demonstrations that the PM allowable over a range of operation levels cannot be exceeded; therefore, the designation of "regulatory allowable" has been used in place of a specific PM allowable (The applicable regulations prescribe increasing PM allowable for increasing equipment capacities). Note, since the control devices were sized for the maximum capacity of the equipment (and therefore, for the maximum PM allowable), the one-time compliance demonstrations' range includes these "endpoints". In addition, since the control device efficiency needed was significantly above 90%, the

source is required to perform an initial PM stack test for emission points [E-BLR-(ASH & #4CCS)]. The source also requested actual PM allowables, for emission points subject to either Regulation 6.09 or 7.08, not be included in the permit for reasons of confidentiality, as the capacity of the affected equipment could be determined from these. For Boilers #1 and #5 [E-BLR-(#1BLR & #5BLR)] subject to Regulation 6.07 or 7.06, the source has submitted one-time compliance demonstrations that the PM allowable, using AP-42 emission factors and combusting either natural gas or #2 fuel oil, cannot be exceeded. For emission points with control devices required to meet the PM allowable, preventive maintenance is required in conjunction with visible emission surveys.

ii. **Opacity** - The source is required to perform visible emissions surveys for emission points [E-BLR-(#1BLR, #4BLR, #5BLR, #6BLR, ASH, & #4CCS)] to demonstration compliance with the applicable opacity standard.

iii. **SO_2** - For emission points E-BLR-(#4BLR & #6BLR), the source is required to maintain records of the monthly fuel usage, and hours of operation for each boiler. In addition, the source is required to maintain records of shipper certification for the coal that demonstrates compliance with the %sulfur and heating content limits. In addition, the source is required to sample the coal monthly to verify the shipper certifications. Also, the source is required to calculate the lbs SO_2/MMBtu daily to demonstrate compliance with emission standard. The District has determined that this is sufficient to demonstrate compliance with the emission limits specified in the applicable regulation. For emission points E-BLR-(#1BLR & #5BLR), the source has submitted one-time compliance demonstrations that the SO_2 allowable, using AP-42 emission factors and combusting either natural gas or #2 fuel oil, cannot be exceeded. But, the source is required to maintain the fuel oil certifications that demonstrate that the sulfur content meets the low sulfur requirement (0.5%) in the permit. District operating permit #1621-73 for boiler #6 contained a calculation methodology error for SO_2. This error was corrected in the Title V permit by allowing the source to use the current AP-42 emission factors in determining SO_2 emissions. The District clarified the percent sulfur content and heating value limits for coal specified in Additional Condition 1.c.iii.2) for boilers #4 and #6.

iv. **NO_X** - The source is required to comply with the NO_X RACT Plan adopted by Board Order on December 20, 2000.

b. U-LPA:

i. **VOC** - For emission points subject to Regulation 7.12: The equipment and operational standards specified in these regulations are sufficient

to demonstrate compliance, therefore, periodic monitoring for these emission points is not required. For non-VCM emission points subject to Regulation 6.24, the source has demonstrated that its *potential, uncontrolled* VOC emissions are less than 450 pounds per hour and 3000 pounds per day for each emission point. Since the source's demonstration is based on VOC PTE without controls, no monitoring and reporting are required. But, since the one-time compliance is based on a maximum VOC content by weight, the source is required to maintain Material Safety Data Sheets (MSDSs) to demonstrate compliance with 44.5% VOC by weight limit on raw material for emission points E-LPA-TK-(4D, 6D, 7D, 9D, 13D, 14D, 16D, 1C thru 6C). For non-VCM emission points subject to Regulation 7.25, the source has demonstrated that its *potential, uncontrolled* VOC emissions cannot exceed the VOC emissions demonstrated in the Retro-BACT determination submitted on October 2, 2000. Since the source's demonstration is based on VOC PTE without controls, no monitoring, record keeping, and reporting are required.

ii. **VCM** - The source shall comply with the monitoring requirements addressed in 40 CFR 63 Subparts J and UU. Also, the District has determined these requirements are sufficient to demonstrate compliance with the emission limits for VCM NESHAP/MACT emission points subject to Regulations 6.24 and 7.25 (as VOC).

iii. **TAPs** - Instead of monitoring, the source has requested to demonstrate compliance with District only enforceable Regulations 5.11 and 5.12 by implementing a Management of Change System (MOCS). This system will track changes in operation (including raw materials use) which might affect compliance with these regulations.

iv. **PM** - In place of parametric monitoring of control devices required to meet PM standards, the source has chosen to perform preventive maintenance to monitor proper operation of required control devices. For emission points E-LPA-[DR-1M (including HPR-2M); SED-1M; SED-1H (including DR-1H; SED-3H; HPR-1H); TK- (1K thru 10K); and VCS] subject to Regulation 6.09 or 7.08, the source has submitted one-time compliance demonstrations that the PM allowable over a range of operation levels cannot be exceeded; therefore, the designation of "regulatory allowable" has been used in place of a specific PM allowable (The applicable regulations prescribe increasing PM allowable for increasing equipment capacities). Note, since the control devices were sized for the maximum capacity of the equipment (and therefore, for the maximum PM allowable), the one-time compliance demonstrations' range includes these "endpoints". In addition, since the control device efficiency needed was significantly above 90%, the source is required to perform an initial PM stack test for emission points E-LPA-[DR-1M (including HPR-2M); SED-1M; SED-1H (including DR-1H; SED-3H; HPR-1H); TK- (1K thru 10K); and VCS]. The source also requested actual PM allowables, for

emission points subject to either Regulation 6.09 or 7.08, not be included in the permit for reasons of confidentiality, as the capacity of the affected equipment could be determined from these. For emission points with control devices required to meet the PM allowable, preventive maintenance is required in conjunction with visible emission surveys. The source has submitted one-time compliance demonstrations for emission points E-LPA-(4D; 6D; 13D; 30D; 25D; 2N; 1C; 4C; & 8C); E-LPA-RR#1BIN, but, since the source could not verify the emission factors used to demonstrate compliance, the source is required to perform an initial PM stack test to verify these emission factors. The source has accepted annual and daily emission limits on emission points E-LPA-[DR-1M (including HPR-2M); SED-1M; SED-1H (including DR-1H; SED-3H; HPR-1H); and TK- (1K thru 10K)] to avoid PSD applicability, therefore, the source is required to keep records of the monthly production rate and calculate a daily average to demonstrate compliance with the applicable emission limit. The source submitted a permit application dated July 12, 2000, to modify the H-dryer Unit which included the addition of a cyclone. Upon review the District made the determination that an emission increase for PM was not needed and the source agreed to keep the previous PM emission limit of 35 tons/year for emission points E-LPA-SED-1H (including DR-1H; SED-3H; HPR-1H).

v. **Opacity** - The source is required to perform visible emissions surveys for U-LPA emission points subject to Regulations 6.09 and 7.08 to demonstration compliance with the applicable opacity standard.

c. U-MSC:

VOC - The District has determined that the operating and record keeping requirements specified in Regulation 6.18 are sufficient to demonstrate compliance for this emission unit.

6. Off-Permit Documents:

Document	**Date**
Risk Management Plan	June 18, 1999
MOCS	October 2000
One-Time Hourly and Annual PM Compliance Demonstration	August 31, 2000; October 2, 2000 March 9, 2001
VOC Reg. 6.24 One-Time Compliance Demonstration	October 2, 2000; March 9, 2001; March 23, 2001
VOC Reg. 7.25 One-Time Compliance Demonstration	October 2, 2000
VOC Retro-BACT Evaluation and VOC Retro-BACT PTE Calculations for Reg. 7.25	October 2, 2000; October 25, 2000
One-Time SO_2 and PM Compliance	October 13, 2000

Demonstrations for Boilers Nos. 1 and 5

The District considers an "off-permit document" as a document on which a source's compliance with any given regulation(s) is contingent upon or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCSs, or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.

2. **Short Term Activities:** The source did not report any short term activities.

3. **Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no schedule of compliance or progress reports are necessary. Additionally, the source identified in its two (2) initial permit applications, and subsequent addenda, applicable and non-applicable Federal and District regulations in effect at the time of the permit applications. This permit grants a permit shield based upon the District's review of these documents, and the source's request for this permit shield.

4. **Emissions Trading:** None

5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.

6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone-depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. This source, however, currently uses the following listed chemicals: HCFC-22 (R22); HCFC-142b; HCFC-124; R12; and R11 refrigerants for additives and the plant chilled water system; and Halon 1301 in fire extinguishing systems.

7. **Prevention of Accidental Releases 112(r):** The source does manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68 Subpart F and Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount; therefore, the source must comply with all applicable requirements in Regulation 5.15. The required Risk Management Plan was submitted on June 18, 1999.

8. **Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Insignificant Activities		
Description	**Quantity**	**Basis**
Combustion Sources <10 MMBTU/HR	various	Regulation 2.02, section 2.1
Coal Pile	various	No Applicable Regulation
Coal moving equipment (mobile equipment)	various	Regulation 2.02, section 2.2
Soil or Groundwater remediation	various	Regulation 2.02, section 2.3.20
Internal combustion engines	various	Regulation 2.02, section 2.2
Brazing, soldering, or welding equipment	various	Regulation 2.02, section 2.3.4
Woodworking, not including hogging or burning	various	Regulation 2.02, section 2.3.5
Emergency relief vents and ventilating systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Lab ventilating and exhausting systems for nonradioactive materials	various	Regulation 2.02, section 2.3.11
Unleaded Gasoline Storage Tank (200 gallon) [VOC Storage Tank < 250 gallon; with pump (10,000 gallons per month)]	various	Regulations 2.02, section 2.3.24; 6.40, sections 1.1 & 2.14; and 7.15, section 2.1
Metal Band Saws	various	No Applicable Regulation
Clarifier	various	No Applicable Regulation
Water Chemical Treatment	various	No Applicable Regulation
Above-ground Diesel Fuel Storage Tanks (BHDTK, CDTK, EGDTK)	various	Regulation 2.02, section 2.3.9.2
Miscellaneous Drums and Totes (BLR; LPA; MSC)	various	Regulation 2.02, section 2.3.24
Cooling Towers, non chromium treated water	various	Regulation 40 CFR 63 Subpart Q (63.400)
NaOH Solution Tank	various	No Known Regulated Pollutants
Additive Tank TK-1N	various	No Known Regulated Pollutants
Emergency Generators and Internal Tanks	various	EPA White Papers
Maintenance Painting	various	EPA White Papers

a. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained

in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

b. Activities identified in Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.

i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated

ii. No periodic monitoring shall be required for facilities designated as insignificant activities.